

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

RECEIVED

ANNYE J. THOMAS, c/o  
THE ESTATE OF LAKECIA Q.  
BROADNAX,

2007 JAN -9 P 4:17

DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

Plaintiff,

v.

CV-06 2:06-CV-1091-MHT

AUTO-OWNERS INSURANCE  
COMPANY,

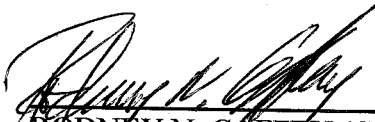
Defendants.

**PLAINTIFF'S MOTION FOR LEAVE  
OF COURT TO OFFER INITIAL DISCLOSURES**

**COMES NOW** The Plaintiff, by and through her undersigned counsel,  
**and does hereby moves the Court for Leave to Offer Plaintiff's Initial  
Disclosures, and as grounds states the following:**

**WHEREFORE Premises Considered,** the Plaintiff respectfully requests that  
this Honorable Court, based on the afore-mentioned reasons, grant Plaintiff Leave to  
Offer her Initial Disclosures.

**Respectfully Submitted:** on this the \_\_\_\_\_ day of January 2007.

  
\_\_\_\_\_  
RODNEY N. CAFFEY (CAF002)  
Attorney for Plaintiff

ADDRESS OF COUNSEL:

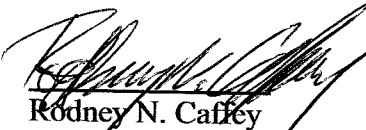
RODNEY N. CAFFEY  
ATTORNEY AT LAW  
Post Office Box 2012  
Montgomery, AL 36102  
Telephone: (334) 220-4310

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9<sup>th</sup> day of January 2007, I have served a copy of the

Foregoing, upon the following by electronic mail:

Roger S. Morrow, Esq., & Joel H. Pearson, Esq.  
Morrow, Romine, & Pearson, P.C.  
122 South Hull Street  
P.O. Box 4804  
Montgomery, AL 36103-4804

  
\_\_\_\_\_  
Rodney N. Caffey